

EXHIBIT A

Revised Proposed Order

Berger, Fischhoff, Shumer,
Wexler & Goodman, LLP
6901 Jericho Turnpike, Suite 230
Syosset, New York 11791
Heath S. Berger, Esq.
Gary C. Fischhoff, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Case No: 23-12055

Debtor
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**ORDER EXTENDING THE EXCLUSIVE PERIODS DURING WHICH THE DEBTOR
MAY FILE A PLAN AND SOLICIT ACCEPTANCES THEREOF
PURSUANT TO 11 U.S.C. § 1121 (d)**

Upon the application (the “Application”) of Rudolph W. Giuliani, the debtor and debtor-in-possession (the “Debtor”) dated March 11, 2024 (the “Application”) (ECF # 142), by his attorneys Berger, Fischhoff, Shumer, Wexler & Goodman, LLP, for the entry of an Order extending for 120 days the periods during which the Debtor may file a plan and 180 days during which the Debtor can solicit acceptances of a plan (together, the “Exclusive Periods”), pursuant to section 1121(d) of title 11 of the United States Code (the “Bankruptcy Code”); a hearing on the Debtor’s Application having been held before this Court on April 4, 2024 (if necessary), at which appeared Berger, Fischhoff, Shumer, Wexler & Goodman, LLP, the United States Trustee and Akin Gump Strauss Hauer & Feld LLP for the official committee of unsecured creditors appointed in the Debtor’s chapter 11 case (the “Committee”); it appearing that sufficient notice of the Debtor’s Application has been given and no further notice is required; and good sufficient cause appearing therefor; it is

ORDERED that the Debtor’s Application is granted as provided herein; and it is

ORDERED that in accordance with section 1121(d) of the Bankruptcy Code, the Exclusive Period during which the Debtor may file a plan is hereby extended through and including June 18, 2024 without prejudice to the Debtor to seek further extensions of time consistent with the Bankruptcy Code; and it is further

ORDERED that in accordance with section 1121(d) of the Bankruptcy Code, the Exclusive Period during which the Debtor may solicit acceptances of a plan (or an amended version thereof) is hereby extended through and including August 19, 2024; and it is further

ORDERED that nothing contained herein shall constitute a waiver of any of the rights of any party.